


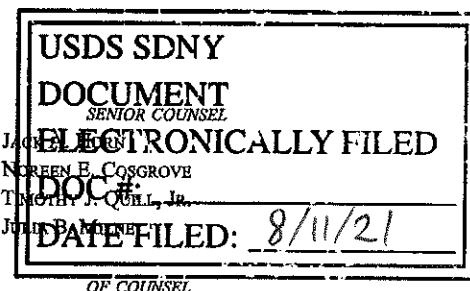
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APPLICATION GRANTED
SO ORDERED


John G. Koeltl, U.S.D.J.

8/11/21



HONORABLE VITO J. TITONE (dec.)
(NY State Court of Appeals 1985-1998)

HARVEY J. HOROWITZ (dec.)

HONORABLE HOWARD MILLER
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*ADMITTED TO PRACTICE ONLY BEFORE ALL
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IN NEW YORK CITY

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August 10, 2021

Via ECF

Hon. John G. Koeltl
U.S. District Court, Southern District of New York
United States Courthouse
500 Pearl Street, Courtroom 14A
New York, New York 10007

Re: *Linda Hurley, et al. v. Peter S. Kosinski, et al.*, Case No. 1:20-cv-04148-JGK (the "WFP Action"), *SAM Party of New York, et al. v. Peter S. Kosinski, et al.*, Case No. 1:20-cv-00323—JGK (the "SAM Action"), *Libertarian Party of New York, et al. v. New York State Board of Elections, et al.*, Case No. 1:20-cv-05820-JGK (the "LPNY Action")

Dear Judge Koeltl:

This firm represents Plaintiffs in the WFP Action. We write pursuant to Your Honor's Individual Practice Rules upon the expiration of the stay for WFP to provide an update to the Court. Following the death of Plaintiff's counsel, Kevin Goering, the Court entered a stay of the WFP Action until August 10, 2021. (ECF Nos. 65, 67.)

MINTZ & GOLD LLP
ATTORNEYS AT LAW

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In accordance with the parties' conference with the Court on July 6, our firm has conferred with counsel for Defendants in all the above-referenced actions, who has consented to a briefing schedule whereby, with the Court's approval, Plaintiffs in the WFP Action will file their opposition to Defendants' pending motion for summary judgment by August 31, 2021. Also consistent with the parties' conference with the Court, Defendants and Plaintiffs in the WFP Action will confer with Plaintiffs in the other actions to determine if all parties can agree on a single joint reply date for Defendants, whose reply to the opposition papers in the SAM Action and the LPNY Action is currently due on August 27, 2021.

We hope to submit a jointly proposed briefing schedule for the Court's approval shortly.

Respectfully submitted,

/s/ Peter Guirguis
Peter Guirguis (PG-2168)

cc: All counsel (via ECF)
Counsel for the SAM Party, et al. (via-email)
Counsel for the Libertarian Party, et al. (via-email)